

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

MDL NO. 2804

Civ. No. 1:17-md-02804-DAP

THIS DOCUMENT RELATES TO:

JUDGE POLSTER

Track 1B Cases

RITE AID OF MARYLAND INC.'S TRIAL WITNESS LIST

Pursuant to Federal Rule of Civil Procedure 26 and the Revised Track One-B Civil Jury Trial Order, dated May 29, 2020, Defendant Rite Aid of Maryland, Inc. d/b/a Rite Aid Mid-Atlantic Customer Support Center (“Rite Aid”) hereby discloses the following witnesses who may testify at trial, either live or by designation, on its behalf.¹

In serving this witness list, Rite Aid specifically reserves the right to amend, supplement, or otherwise modify these disclosures, including if new or modified information is provided at any point. Rite Aid reserves the right to supplement and/or amend this witness list as the result of ongoing depositions in this action. Rite Aid also reserves the right to supplement and/or to

¹ Rite Aid separately joins the Pharmacy Defendants’ Joint Trial Witness List and reserves the right to offer the testimony of the witnesses listed there.

amend its list with any witnesses identified on any party's witness list, including the Plaintiffs' lists, and including any party who later settles or is severed or dismissed. Rite Aid further reserves the right to conduct a direct examination of any witness called by a Plaintiff and/or to call additional witnesses not identified on this list, either live or by designation, that are submitted as part of current or future deposition designations by any other party. Rite Aid reserves the right to call any of these witnesses and any of Plaintiffs' 30(b)(6) witnesses whose testimony is designated as live witnesses in its case in chief. Rite Aid further reserves the right to supplement and/or to amend this witness list in response to rulings of the Court on pretrial motions and to call witnesses, either live or by designation, to rebut Plaintiffs' case.

WITNESSES²

A. Rite Aid Witnesses

1. Christopher Belli, Former Operations Senior Manager, Rite Aid Hdqtrs. Corp.

Areas of Testimony: Mr. Belli is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to his duties and responsibilities as a Former Operations Senior Manager, related to his previous relevant employment, and/or related to his previous deposition testimony in this action.

2. Richard Chapman, Former Vice President, Logistics, Rite Aid Hdqtrs. Corp.

Areas of Testimony: Mr. Chapman is expected to testify concerning matters related to the claims and defenses in this action, including but not

² Rite Aid reserves the right to call any witness live at trial. Rite Aid additionally reserves the right to present the deposition testimony of any witness listed herein, where permitted by any applicable rules, orders of the Court, or agreement of the parties. By including former employees on this witness list, Rite Aid does not admit or otherwise concede each such potential witness is under Rite Aid's control. Nor does Rite Aid admit or concede that it is able to require former employees to appear for trial in this case, by subpoena or otherwise.

limited to matters related to his duties and responsibilities as a Former Vice President of Logistics, related to his previous relevant employment, and/or related to his previous deposition testimony in this action.

3. Debra Chase, Order Fulfillment Partner for Centralized Products, Rite Aid of Maryland, Inc.

Areas of Testimony: Ms. Chase is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to her duties and responsibilities as an Order Fulfillment Partner for Centralized Products, related to her previous relevant employment, and/or related to her previous deposition testimony in this action.

4. Keith Frost, Manager of Centralized Products, Rite Aid of Maryland, Inc.

Areas of Testimony: Mr. Frost is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to his duties and responsibilities as a Manager of Centralized Products, related to his previous relevant employment, and/or related to his previous deposition testimony in this action.

5. Janet Hart, Director, Government Affairs, Rite Aid Hdqtrs. Corp.

Areas of Testimony: Ms. Hart is expected to testify concerning her duties and responsibilities as the Director of Government Affairs, and on matters related to her other previous relevant employment and experience.

6. Kevin Mitchell, Former Senior Director, Regulatory Compliance, Rite Aid Hdqtrs. Corp.

Areas of Testimony: Mr. Mitchell is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to his duties and responsibilities as Former Senior Director of Regulatory Compliance, related to his previous relevant employment, and/or related to his previous deposition testimony in this action.

7. Sophia Novack, Former Director, Pharmacy Loss Prevention, Rite Aid Hdqtrs. Corp.

Areas of Testimony: Ms. Novack is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to her duties and responsibilities as a Former Director of Pharmacy Loss Prevention, related to her previous relevant employment, and/or related to her previous deposition testimony in this action.

8. Andrew Palmer, Group Vice President, Compliance, Privacy, and International Assurance Services, Rite Aid Hdqtrs. Corp.

Areas of Testimony: Mr. Palmer is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to his duties and responsibilities as the Group Vice President of Compliance, Privacy, and International Assurance Services, related to his previous relevant employment, and/or related to his previous deposition testimony in this action.

9. Larry Ringgold, DEA Coordinator for Security, Rite Aid of Maryland, Inc.

Areas of Testimony: Mr. Ringgold is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to his duties and responsibilities as the DEA Coordinator for Security, related to his previous relevant employment, and/or related to his previous deposition testimony in this action.

10. Marian Wood, Former DEA Coordinator, Rite Aid of Maryland, Inc.

Areas of Testimony: Ms. Wood is expected to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to her duties and responsibilities as a DEA Coordinator, related to her previous relevant employment, and/or related to her previous deposition testimony in this action.

B. Expert Witnesses

1. Dr. Anupam Jena, Ph.D, Ruth L. Newhouse Associate Professor of Health Care Policy and Medicine at Harvard Medical School; Physician at Massachusetts General Hospital

Areas of Testimony: Dr. Jena is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

Dated: September 21, 2020

Respectfully submitted,

/s/ Kelly A. Moore

Kelly A. Moore, Esq.

kelly.moore@morganlewis.com

Morgan, Lewis & Bockius LLP

101 Park Avenue

New York, NY 10178-0060

T: 212-309-6612

F: 212-309-6001

John P. Lavelle, Jr., Esq.

John.lavelle@morganlewis.com

Morgan, Lewis & Bockius LLP

1701 Market Street

Philadelphia, PA 19103-2921

T: 215-963-5917

F: 215-963-5001

*Attorneys for Rite Aid of Maryland, Inc., d/b/a
Mid-Atlantic Customer Support Center*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served via the Court's ECF system to all counsel of record in this case on September 21, 2020.

/s/ Kelly A. Moore

Kelly A. Moore

MORGAN, LEWIS & BOCKIUS LLP

101 Park Avenue

New York, NY 10178

Phone: (212) 309-6612

Fax: (212) 309-6001

E-mail: kelly.moore@morganlewis.com

*Attorney for Rite Aid of Maryland, Inc.,
d/b/a Mid-Atlantic Customer Support Center*